

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW JAMES MCGONIGLE, on
behalf of himself and others similarly
situated,

Plaintiff,

v.

TRANSFORM SR BRANDS LLC,

Defendant.

Case No. 1:25-cv-01674-SRH

Hon. Sunil R. Harjani

Oral Argument Requested

Electronically Submitted

DECLARATION OF BECCA J. WAHLQUIST

I, Becca J. Wahlquist, declare as follows:

1. I am a member of the Bar of the State of California and am a Partner with the law firm Kelley Drye & Warren LLP.
2. I submit this declaration in support of Defendant Transform SR Brands LLC's ("Transform") Reply Memorandum of Law in Further Support of its Motion to Dismiss.
3. Pursuant to this Court's Case Procedures, attached to this Declaration are all cited authorities from Transform's Reply Memorandum that are not available on Westlaw.
4. Attached hereto as **Exhibit J** is a true and correct copy of an excerpt from the definition of the term "line" from the Merriam-Webster Dictionary.
5. Attached hereto as **Exhibit K** is a true and correct copy of an excerpt from the definition of the term "line" from the Oxford English Dictionary.

6. Attached hereto as **Exhibit L** is a true and correct copy of Plaintiff's Opposition to the Motion to Dismiss in *McGonigle v. FTD, LLC*, No. 1:24-cv-12201, Dkt. 26 (N.D. Ill.), dated April 7, 2025.


7. Attached hereto as **Exhibit M** is a true and correct copy of Plaintiff's Opposition to the Motion to Dismiss in *McGonigle v. Everyday Dose LLC*, No. 1:24-cv-25115, Dkt. 19 (S.D. Fla.), dated May 1, 2025.

8. Attached hereto as **Exhibit N** is a true and correct copy of Plaintiff's Opposition to the Motion to Dismiss in *McGonigle v. Alliance Entertainment, LLC*, No. 0:24-cv-62443, Dkt. 26 (S.D. Fla.), dated June 3, 2025.

9. Attached hereto as **Exhibit O** is a true and correct copy of Plaintiff's Opposition to the Motion to Dismiss in *McGonigle v. ShoppersChoice.com, LLC*, No. 3:25-cv-00152, Dkt. 52 (M.D. La.), dated July 1, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 5, 2025


BECCA J. WAHLQUIST